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November 21, 1996

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

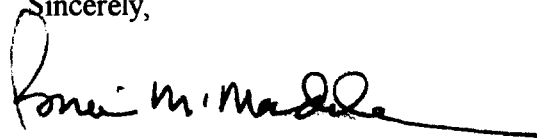
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Dear Mr. Caton:

On behalf of Eagle Communications, Inc., there are transmitted herewith an original and five copies of its Comments in response to the Commission's Sixth Further Notice of Proposed Rule Making in MM Docket No. 87-268.

If any additional information is desired in connection with this matter, please contact the undersigned counsel.

Sincerely,



Brian M. Madden

BMM/tlm
Enclosure

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BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Advanced Television Systems and)
Their Impact Upon the Existing)
Television Broadcast Service)

MM Docket No. 87-268

To: The Commission

COMMENTS OF EAGLE COMMUNICATIONS, INC.

Eagle Communications, Inc. ("ECI"), by its attorneys, hereby submits these comments with respect to the Commission's Sixth Further Notice of Proposed Rule Making in MM Docket No. 87-268, FCC 96-207, released August 16, 1996 ("Notice").¹

ECI is the licensee of Stations KECI-TV, Missoula, Montana; KCFW-TV, Kalispell, Montana; and KTVM(TV), Butte, Montana, as well as a number of television translator stations which rebroadcast the signals of ECI's stations in small communities in Montana and Idaho. ECI has reviewed the DTV channel proposals made by the Broadcasters' Caucus in its Modified Table, and concurs in the proposals as to DTV Channel 16 for Station KCFW-TV at Kalispell and DTV Channel 27 for Station KTVM at Butte. However, for Station KECI-TV at Missoula, the Modified Table proposes DTV Channel 36, which would most ideally have to be

¹ ECI is also a signatory to the Broadcasters' Comments being filed in response to the Notice on behalf of the Broadcasters' Caucus and a number of individual station licensees. In the main, ECI endorses and supports the Broadcasters' Comments; however, as indicated in that filing, not every signatory subscribes to each aspect of those comments in their entirety and, as in ECI's case, certain individual licensees will be filing separate comments.

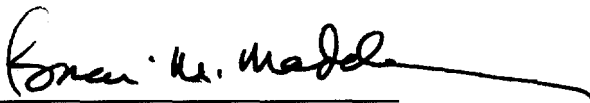
co-located with the proposal for DTV Channel 35 for Station KPAX(TV) in Missoula, Montana. For the reasons set forth in the Broadcasters' Comments, and since there are not currently antennas or transmission lines capable of handling the combined power that these two co-located stations would produce, ECI has suggested to the Broadcasters' Caucus that DTV Channel 21 be assigned for Station KECI-TV instead of Channel 36. This suggestion has been endorsed by the Region 2 Inland Northwest Subcommittee of the Broadcasters' Caucus. ECI respectfully requests that Channel 21 be the DTV channel ultimately assigned for use by Station KECI-TV in Missoula.

As noted at the outset of these comments, ECI is a signatory to the comments of the Broadcasters' Caucus and generally supports those comments. Based upon its experience serving mountainous regions within Montana and Idaho with its three primary television stations and numerous television translator stations, ECI is especially concerned that the Commission not adopt the core-channel proposal discussed in the Notice because of the resulting substantial adverse impact on service rendered by existing television translators. ECI's stations provide signals to numerous small, and in many cases relatively isolated communities, through a series of television translator stations. As acknowledged by the Commission, Notice at 28, implementation of the core-channel plan would create significant displacement problems; the Broadcasters' Caucus believes the adverse impact of this plan on translator stations to be much more severe than the Commission's estimate. Retention of a maximum degree of spectrum flexibility will inevitably minimize the potential loss of service now provided by translator stations, and ECI accordingly urges that the Commission reconsider and discard the core-channel proposal.

For the reasons set forth above, ECI respectfully requests that the DTV allotment for Station KECI-TV be modified to specify operation on Channel 36. In all other respects, Eagle endorses and supports the Broadcasters' Comments being filed contemporaneously.

Respectfully submitted,

EAGLE COMMUNICATIONS, INC

By 

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November 21, 1996